

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the remarks and amendments herewith. The present Response is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1, 2, 7-9, 12-14, 23, 24, 28-31, 34-36, 45-47 and 49 are pending. Claims 1, 2, 9, 12, 23, 24, 28, 31, 34, 45-47 and 49, which are independent, are hereby amended. No new matter has been added. Support for this amendment is provided throughout the Specification as originally filed. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112 beyond the remarks. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 1-2, 7-9, 12-14, 23-24, 28- 31, 34-36, 45-47 and 49 were rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,195,090 to Riggins, III (hereinafter, merely "Riggins") in view of U.S. Publication No. 2002/0090217 to Limor et al. (hereinafter, merely "Limor") and further in view of U.S. Publication No. 2001/0042105 to Koehler, et al. (hereinafter, merely "Kochler") and further in view of U.S. Patent No. 6,,608,649 to Suzuki, et al. (hereinafter, merely "Suzuki") and further in view of US 2005/0198668 A1 to Yuen, et al. (hereinafter,

merely “Yuen”) and further in view of U.S. Patent No. 5,940,073 to Klosterman et al.  
(hereinafter, merely “Klosterman”).

### III. RESPONSE TO REJECTIONS

Claim 1 recites, *inter alia*:

“...a mode for displaying specific profile information and for displaying the specific profile information hierarchically, such that when an operation input requesting the disclosure of more detailed information of an item on the screen is input, the requested information linked to the item displayed on the screen in a same location as the selection occurred, and a mode for displaying, hierarchically, a URL related to each movable body embedded in the profile information providing access to a database comprising a web image displayed for a divided screen, **wherein the web image is obtained only by selecting the URL...**” (emphasis added)

Support for the above-identified features is provided at paragraphs [0146], [0156], and [0157] of the Specification as originally filed, which are reproduced below:

[0146] However, the service provider of the primary station 10 and the secondary station 30 would be able to prepare a Web image for digital broadcasting 73B besides an ordinary Web image 73A as shown in FIG. 10. Now, the Web image for digital broadcasting 73B means an image in which larger fonts are used and the arrangements of images are devised for the improvement of the visibility of characters and images on the supposition that a Web image is displayed on an auxiliary screen (namely, the Web image is not displayed as the whole screen display and is displayed as a display not using the most part. Generally, the Web image is displayed as a divided screen.) for not impeding the looking and listening of a digital broadcast program.

[0155] Incidentally, it is regarded as general that profile information is prepared hierarchically. For example, when an operation input requesting the disclosure of more

detailed information of the driver or the vehicle of {circle over (1)} on the screen of FIG. 12 is input, the receiver 50 reads out the information linked to the item {circle over (1)} to display the read out information on the screen as shown in FIG. 13. The contents shown on the screen are also supplied from the provider supplying the program.

[0156] By the way, some viewers want to know more detailed information or related information. For such viewers, if a URL 88 and a mail address 89 concerning each movable body are embedded in profile information in order that such viewers may easily access to necessary information, the viewers may obtain the necessary information only by selecting the items with a remote controller or the like, and they may display the necessary information on the screen.

[0157] Incidentally, the receiver 50 is connected with the Internet network through a communication channel at this time, and the receiver 50 downloads necessary information to display the information on a screen. Generally, the information obtained through the Internet is displayed at the display column of profile information in a superposed state lest the obtained information prevent the looking and the listening of a program broadcast. At this time, when the Web image designated by the URL 88 is one prepared for the display in such a digital broadcast screen, the characters and figures of the Web image is displayed with a comparatively large fonts and layouts, and consequently the Web image may be displayed in a state of being comparatively easily looked even if the Web image is displayed in a divided screen.

Claim 1 recites **“wherein the web image is obtained only by selecting the URL”**

Applicants submit that Riggins, Limor, Koehler, Yuen, Suzuki, and Klosterman, taken alone or in combination, fail to teach or suggest or render predictable the above-identified features of Claim 1.

Specifically, the Office Action states that Klosterman teaches “a URL embedded in the profile information providing access to a database comprising a web page displayed for a

divided screen, wherein the web image is obtained only by selecting the URL”. However, the Klosterman does not teach such feature. Klosterman shows that the user is brought to the URL **“just as if the user had connected to the page directly through the web-browser.”**

Therefore, Applicants request that the rejection under Klosterman be withdrawn.

Applicants submit that independent claim 1 is patentable.

Furthermore, Applicants submit that the rejection is guided by impermissible hindsight.

To reject claim 1, the Office Action cites 6 references, which belong to several different fields. Applicants submit that the high number of references used for the rejection, the several different fields that the references come from, and the invalid combination of these references strongly indicate that the rejection is guided by **hindsight** that impermissibly relies on knowledge of Applicants’ disclosure.

Therefore, Applicants submit that independent claim 1 is patentable and respectfully request reconsideration and withdrawal of the rejection.

For reasons similar to those described above with regard to similar recitations of independent claim 1, independent claims 2, 9, 12, 23, 24, 28, 31, 34, 45-47 and 49 are patentable.

#### **IV. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the

invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### **CONCLUSION**


Because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,  
FROMMER LAWRENCE & HAUG LLP  
Attorneys for Applicants

By   
Thomas F. Presson  
Reg. No. 41,442  
Russell P. Blaise  
Reg. No. 66,567  
(212) 588-0800